



750 Third Avenue  
New York, NY 10017-2703  
(212) 687-8181  
Fax: (212) 972-9432  
[www.kreindler.com](http://www.kreindler.com)

September 18, 2017

Via ECF/CM

The Honorable Edgardo Ramos  
United States District Court  
for the Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. El Gammal*, 15-cr-588 (S.D.N.Y.) (ER)

Dear Judge Ramos:

I, along with Donald Duboulay, represent Mr. Ahmed El Gammal, having been appointed following his conviction at trial in January of this year. We write to ask for a 60-day extension of the deadlines for post-trial motions in this case.

Mr. Doublay and I have coordinated with prior counsel, the government and the United States Department of Justice Litigation Security personnel to transfer all case files and obtain access to classified materials. After reviewing all pre-trial and trial materials and familiarizing ourselves with the record and possible areas for post-trial briefing, we have had several meetings with our client. In order, however, to refine the post-trial briefing process, we believe that we need some additional time to meet further with Mr. El Gammal. Without such additional time to coordinate with our client, we will not be able to effectively address any potential post-trial briefing issues.

Currently, post-trial defense motions are due on September 29, 2017. To allow us the time to engage with our client about post-trial motions and potentially narrow the issues to be addressed, we ask that this Court extend all briefing deadlines by 60 days. This is the third such request for an adjournment since Mr. Duboulay and I were appointed by this Court. The government consents to the request.

Accordingly, we ask that this Court set the deadlines for any defense motions as November 28, 2017, government opposition as December 22, 2017 and defense reply as January 12, 2018 (to account for scheduling complications over the winter holiday period.)

Respectfully submitted,

/s/ Megan W. Bennett

cc: All counsel of record via ECF/CM

**California Office**

707 Wilshire Boulevard, Los Angeles, CA 90017-3613  
Tel: (213) 622-6469 Fax: (213) 622-6019

**Massachusetts Office**

855 Boylston Street, Boston, MA 02116-2688  
Tel: (617) 424-9100 Fax: (617) 424-9120